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## **MEMO ENDORSED**

E-mail Address Brooke.Cucinella@stblaw.com

BY ECF

March 8, 2022

Re: United States v. Ruless Pierre, 19 Cr. 783 (SHS)

Honorable Sidney H. Stein United States District Judge Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, New York 10007-1312

Dear Judge Stein:

We represent Ruless Pierre in the above-captioned matter, which is currently scheduled for sentencing on March 21, 2022. On March 7, 2022, we filed a letter application with the consent of the Government to adjourn the date of sentencing to March 23, 24, or 25 due to a scheduling conflict, which remains *sub judice*. *See* ECF No. 100. We respectfully request that the Court adjourn the sentencing date and the associated deadlines for the parties' submissions by one week based on further developments since our March 7 adjournment request. The Government consents in this application.

Over the past several weeks, the parties have been diligently working collaboratively, even through yesterday, to come to agreement on issues relating to restitution, and the defense team has been working hard to review and discuss complex factual and legal issues relating to restitution and loss amount with Mr. Pierre. The requested adjournment of one week will allow defense counsel sufficient time to finish reviewing and discussing these issues with our client.

We thank the Court again for its consideration of this request.

Respectfully submitted.

Brooke E. Cucinella

The sentencing is adjourned to April 6 at 2:30 p.m. The defense submissions are due by March 23, 2022, the government submissions are due by March 30, 2022.

Dated: New York, New York

March 8, 2022

SO ORDERED:

Sidney H. Stein, U.S.D.J.